

Alliance for Nuclear Accountability

*A national network of organizations working to address issues of
nuclear weapons production and waste cleanup*

RRR000726

January 10, 2008

Jane R. Summerson
M. Lee Bishop
Environmental Impact Statement Office
U.S. Department of Energy
Office of Civilian Radioactive Waste Management
1551 Hillshire Drive
Las Vegas, NV 89134

Re: Comments on Draft Repository Supplemental Environmental Impact Statement and Draft Nevada Rail Corridor/Alignment Environmental Impact Statement

Dear Ms. Summerson and Mr. Bishop,

The Alliance for Nuclear Accountability is a twenty one year old non-profit organization which networks and represents over thirty-five groups around the United States. Some of our members are in close proximity to the Yucca Mountain site, and many are located near the sites of currently stored nuclear waste and the proposed transportation routes.

Please consider and address the following significant concerns which we have regarding the draft documents referred to above:

- 1 [1] The Yucca Mountain site is inherently a geologically flawed site due to its seismic activity, volcanism, underlying aquifer and porous material. While it may have been a political decision to choose Yucca Mountain as the repository site, the site presents scientific and technical challenges due to its characteristics.]
- 2 [2] There is inadequate analysis of groundwater impacts, in terms of understanding the flow system itself and also considering future impacts of groundwater pumping.]
- 3 [3] There is inadequate analysis of the land ownership issues brought up by the Treaty of Ruby Valley, 1863, the impacts to the Timbisha Shoshone Tribe, and the socio-economic impacts on the communities adjacent to the proposed site.]
- 4 [4] The No Action Alternatives are unrealistic, suggesting that at each current site the waste would either be maintained for 100 years and then terminated, or maintained for ten thousand years. NEPA regulations require that alternatives considered must be reasonable.]
- 5 [5] The radiation exposure health standards have not been established. Without these standards, how can the safety of the proposed actions be adequately judged? Also, these standards should be based on the 'Reference Family' concept rather than the currently used 'Reference Man;' a pregnant woman and her fetus are the most vulnerable part of the human population. These health standards also need to reflect the 2005 report on the Biological Effects of Ionizing Radiation Report VII, which states that all exposure to radiation has a health effect and that all exposure is cumulative.]



- 6 [6) The proposed Transportation, Aging and Disposal (TAD) canisters present a number of concerns:
- a. There has not been full scale testing of these devices; such testing is needed for such an essential component of this proposal.
 - b. This plan necessitates on-site packaging capacity for each site where waste is now stored, with each location being responsible for safe handling of the nuclear waste, dealing with damaged or deteriorating fuel rods and assemblies, permanently sealing the canisters, and assuring canister integrity from fabrication to sealing.
 - c. The TAD canisters require the utmost scrutiny and testing as they are the man-made engineered barrier upon which the safety of the project depends. Peak radiation levels are expected to occur in about 300,000 (three hundred thousand) years, so these containers must perform for longer than that.]
- 7 [7) Transportation plans and risks are inadequately addressed. Transportation routes through 45 states and the District of Columbia need to be defined and discussed before license issuance. Also, the fatality estimates from transportation risks (accidents and/or attacks) presented in these documents is greatly less than the State of Nevada calculations; this discrepancy needs to be resolved.]
- 8 [8) The proposal to increase storage capacity at Yucca Mountain does not present an underground layout and demonstrate the safety of such a layout. There are also existing capacity limits defined by the amended Nuclear Waste Policy Act, so at present, this proposal is not even legal.]

Thank you for considering these concerns.

Sincerely,



Alfred Meyer, Program Director
Alliance for Nuclear Accountability